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June 25, 2025

**VIA ECF**

The Honorable Lewis J. Liman  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Room 1620  
New York, NY 10007

**Re: Stephanie Jones and Jonesworks v. Jennifer Abel, et. al., No. 1:25-cv-00779**

Dear Judge Liman:

We write on behalf of Blake Lively, Plaintiff in the related action *Lively v. Wayfarer Studios LLC, et al.*, No. 1:24-cv-10049-LJL (the “Related Action”), in connection with Defendant and Counterclaimant Jennifer Abel’s motion for an order compelling the production of documents from non-party Vanzan, Inc. (“Vanzan”) (the “Motion”). We write to alert the Court that the Motion omits critical information that creates a materially misleading record. Specifically, Ms. Abel seeks to compel Vanzan to produce, among other things: (1) a copy of the subpoena served by Vanzan on Plaintiff Jonesworks LLC in the matter *Vanzan v. Does 1-10*, New York Supreme Court Index No. 655130/2024 (the “Vanzan Subpoena”) (a subset of request 10); and (2) the documents Jonesworks LLC produced in response to the Vanzan Subpoena (a subset of request 11). The Motion omits, however, the fact that ***Ms. Abel and the other Wayfarer Parties have been in possession of the subpoena and documents produced in response to that subpoena since no later than May 16, 2025.***

On May 16, 2025, Ms. Lively produced to counsel for Ms. Abel and the other Wayfarer Parties the following:

- (1) A copy of the Vanzan Subpoena; and
- (2) ***All documents*** produced by Jonesworks LLC in response to the Vanzan Subpoena.

(See Exhibit A.) We note that this firm does not represent Vanzan for the purposes of the Vanzan subpoena that is the subject of this Motion. Vanzan is represented by the Zuckerman, LLP firm, per the certificate of service on the Motion. This letter is not intended to be a response on behalf of Vanzan, but is rather provided for informational purposes to the Court and the parties.

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Respectfully submitted,

/s/ Esra A. Hudson

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# EXHIBIT A



**Stephanie A Roeser**  
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May 16, 2025

**VIA EMAIL**

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Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049 (LJL)  
*Wayfarer Studios LLC v. Lively, et al.*, No. 1:25-cv-449 (LJL)

Counsel:

We write on behalf of Plaintiff/Consolidated Defendant Blake Lively in the above-captioned actions (“Action”). In response to Defendants/Consolidated Plaintiffs’ First Request for the Production of Documents and Things to Ms. Lively, dated February 21, 2025 (the “Requests”), Ms. Lively will soon produce documents bearing the Bates numbers BL-000000001-BL-000007413. You will receive an SFTP link enclosing the document production shortly, and the password for accessing the production will be sent under separate cover.

Ms. Lively’s forthcoming production contains a reproduction of documents that Ms. Lively received in response to a subpoena *duces tecum* to Jonesworks, LLC, dated October 1, 2024 (the “Subpoena”), together with a copy of the Subpoena. Ms. Lively is reproducing the documents responsive to the Subpoena (“Jonesworks Documents”) as she received them. For example, the Jonesworks Documents were produced to Ms. Lively without certain attachments and without the metadata contemplated in the subsequently negotiated Joint Stipulation on the Protocol for Discovery of Electronically-Stored Information and Hard Copy Documents, dated May 13, 2025 (Dkt. No. 212; “ESI Stipulation”). While Ms. Lively’s forthcoming production reflects all metadata fields contemplated in the ESI Stipulation, certain of the fields are not populated because the Jonesworks Documents lacked corresponding metadata. And certain attachments are missing because the Jonesworks Documents did not include them.

This production is made subject to and without waiving any objections set forth in Ms. Lively’s Responses and Objections to the Requests. In addition, this production contains documents stamped “CONFIDENTIAL” pursuant to the Protective Order, dated March 13, 2025 (Dkt. No. 125; the “Protective Order”). These documents may be used only in connection with the Action and must not be shared except as set forth in the Protective Order.

manatt

May 16, 2025

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If you have questions concerning this production, please call me at (310) 312-4207.

Regards,

/s/ Stephanie Roeser

Stephanie Roeser

cc: All Counsel of Record